

REMARKS

1. Applicant thanks the Examiner for the Examiner's comments, which have
5 greatly assisted Applicant in responding.

2. **35 U.S.C. §101.**

10 The Examiner found that, among other things, Applicant's "rules metaphor interface" reference are abstract ideas; that Applicant cites no specific results to define a useful, concrete, and tangible result; that neither does Applicant specify the associated practical application with the kind of specificity the Federal Circuit used. More specifically, the Examiner found that Applicant manipulated a set of abstract "rules metaphor interface" to solve purely algorithmic problems in the abstract. The
15 Examiner stated that the Examiner views the *Warmerdam* holding as the dispositive issue in this analogous case. Further, the Examiner stated that Applicant's phrase "rules metaphor interface" is simply an abstract construct that does not limit the claims to the transformation of real world data (such as monetary data or heart rhythm data) by some disclosed process, concluding that the claims take several
20 abstract ideas (*i.e.* "rules metaphor interface" in the abstract) and manipulate them together adding nothing to the basic equation.

Applicant respectfully disagrees and is of the opinion that the specification taken as a whole quite clearly defines the qualifier, "rules metaphors".

25 According to the Specification, a rules metaphor is defined as follows (see page 6, lines 3-10, emphasis added):

30 The present invention is directed to a method and mechanism for using rules metaphors to implement rules and rulesflows. According to an embodiment of the invention, a rules metaphor provides a visual environment for acquiring, generating, and manipulating rules. Some benefits of utilizing rules metaphors include: 1) allowing an architect/designer to capture rules using interfaces that are closer to the way a business analyst or user
35 generates rules, 2) allowing the rules developer to implement rules using metaphors that are close to the way the requirements and specifications are expressed, and 3) providing more concise and visually understandable representation of rules.

The claimed are clearly drawn to a **computer-based method of implementing rules in a rules-based system and a computer program product that includes a medium usable by a processor, the medium having stored thereon a sequence of instructions which, when executed by said processor, causes said processor to execute a process for implementing rules in a rules-based system.**

Hence, Applicant is of the opinion that it is clear that a rules metaphor provides a set of choices for a developer to choose from, such set representing different types of rulesets, in view of the above and further support found readily apparent in the figures.

Nevertheless, Applicant has deleted the word metaphor in the independent claims 1 and 40. Applicant is of the opinion that it is proper to keep the term in the dependent claims.

Therefore, Applicant deems the rejection overcome and, accordingly, respectfully requests that Examiner withdraw the rejection under 35 U.S.C. §101.

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3. 35 U.S.C. §112, first paragraph.

The Examiner stated that under 35 U.S.C. §112, first paragraph because current case law require such a rejection if a §101 rejection is given because when Applicant has not in fact disclosed the practical application for the invention, as a matter of law there is no way Applicant could have disclosed *how* to practice the *undisclosed* practical application.

In view of the amendment to claims and the discussion herein above Applicant deems the rejection moot and, accordingly, respectfully requests that Examiner withdraw the rejection under 35 U.S.C. §112, first paragraph.

4. It should be appreciated that Applicant has elected to amend the Claims solely for the purpose of expediting the patent application process in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00). In making such cancellation and amendment, Applicant has not and does not in any way narrow the scope of protection to which Applicant considers the invention herein

to be entitled. Rather, Applicant reserves Applicant's right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

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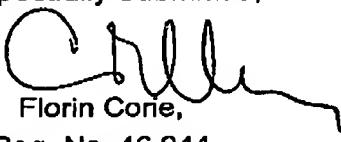
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CONCLUSION

Based on the foregoing, Applicant considers the present invention to be
5 distinguished from the art of record. Accordingly, Applicant earnestly solicits the
Examiner's withdrawal of the rejections raised in the above referenced Office Action,
such that a Notice of Allowance is forwarded to Applicant, and the present
application is therefore allowed to issue as a United States patent. The Examiner is
invited to call to discuss the response. The Commissioner is hereby authorized to
10 charge any additional fees due or credit any overpayment to Deposit Account No.
07-1445.

Respectfully Submitted,

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